



UTAH DEPARTMENT *of*
ENVIRONMENTAL QUALITY
**WATER
QUALITY**

LID Training Recap/ Follow-up Questions

Completed Training

St. George – January 30th

Provo – February 5th

Salt Lake City – February 7th

Logan – February 12th

Questions

When will the PowerPoint slides from the training be available?

We will be posting the slides on our LID webpage within the next week.

Can I get recharge credits because of groundwater recharge from LID features?

No, DWQ does not have a credit program for groundwater recharge.

How is infeasibility determined? Will MS4s get in trouble if they deem something infeasible and DWQ disagrees?

The MS4 determines what is infeasible. As long as sound judgment is used DWQ will accept the MS4's determinations.

Are there exact parameters for infiltration or groundwater depth to determine infeasibility with?

No, it is the MS4's responsibility to determine what parameters they are comfortable accepting within their municipality.

Questions

How is water quality incorporated into the retention requirement? Is the purpose of retention to reduce pollutants or treatment?

This is a numeric interpretation of previous permits' narrative standard. The purpose is to:

1. Reduce pollutants transported via storm water conveyance
2. Recharge groundwater
3. Treat storm water via infiltration
4. Reduce erosion associated with storm water runoff, conveyance, discharge
5. Mimic predevelopment conditions

Is it acceptable for a MS4 to create a map of high ground water or poor soils for their city and use that to determine if LID controls are infeasible?

MS4s can map out areas of their city where conditions exist that may make LID infeasible. The MS4 must still review each site and have documentation stating why it is infeasible.

Questions

If the site can only retain part of the 90th percentile storm is it considered infeasible or must that part be retained?

If only retention of part of the 90th percentile storm is feasible then that part must be retained.

Are there concerns about contamination to groundwater from LID BMPs? Are there any pretreatment requirements prior to infiltration?

There are no specific requirements for pretreatment, however pretreatment should be a consideration to protect groundwater and to increase the life of the BMP. Contamination to groundwater can occur and this must be a consideration during design.

How does LID work in areas with land drains?

If land drains are necessary then infiltration will likely be infeasible due to a high ground water table. Other types of LID may be possible in these areas.

Questions

Is there any grant money available for retrofits using LID?

Yes, there is some non-point source funding that can be applied for. For more information see: <https://deq.utah.gov/legacy/programs/water-quality/non-point-source-management-program/funding.htm>

What are the storm water harvesting and reuse restrictions?

The maximum storm water storage capacity with registration is 2,500 gallons. Without registering, a person may collect and store in a maximum of two containers if neither container exceeds 100 gallons.

To register: <https://waterrights.utah.gov/forms/rainwater.asp>

Questions

When developing large subdivisions or projects is retention required at the source/lot level or is project level acceptable?

DWQ would like to see storm water retained as close to the source as possible, however the use of retention at the development/project level is allowed and may be more practical in some instances compared to having retention at each lot or source.

How does DWQ feel about the use of regional retention controls (outside the project area) or the use of treatment when local retention is not possible?

DWQ agrees with the use of either of these alternatives when retention at the source is infeasible. The MS4 must determine if they want to require a specific alternative in these cases.

Questions

Is there any further guidance on gap analysis and zoning development?

The manual references a gap analysis tool from California that can be used for a gap analysis:
https://www.casqa.org/sites/default/files/downloads/20171109_gap_analysis_user_guide.pdf

The Center for Watershed Protection also has an ordinance worksheet:
<https://owl.cwp.org/mdocs-posts/better-site-design-code-and-ordinance-cow-worksheet-2017-update/>

Objective	Code	Summary of Impediment
Determine if rain gardens, bioretention cells, and other bioretention devices are permitted within parking areas.	ORD 04-13.b Vegetation within parking lots shall be within raised areas and protected by curbs.	The existing code does not permit storm water flows within parking lots to sheet flow into bioretention or vegetated areas.

Questions for Discussion

Is there guidance from DWQ on how to measure infiltration rates and which methods are best to use?

What is the allowable distance between septic systems and LID features?

Is there an affordable method for establishing the historic groundwater table elevation?

How should potential capacity reductions be accounted for?

Other common concerns:

<https://www3.epa.gov/region1/npdes/stormwater/assets/pdfs/AddressingBarrier2LID.pdf>